

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| <p><b>WILMINGTON TRUST, NATIONAL ASSOCIATION, AS TRUSTEE OF THE \$29,615,000 PHILADELPHIA AUTHORITY FOR INDUSTRIAL DEVELOPMENT SENIOR HOUSING REVENUE BONDS (THE PAVILION),</b></p> <p><b>Plaintiff,</b></p> <p><b>v.</b></p> <p><b>PAVILION APARTMENTS PENN LLC,</b></p> <p><b>Defendant.</b></p> | <p><b>CIVIL ACTION</b></p> <p><b>NO. 2:22-cv-03985-GJP</b></p> <p><b>Judge Gerald J. Pappert</b></p> |
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## PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT

TO THE CLERK:

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff, Wilmington Trust, National Association, as Trustee of the \$29,615,000 Philadelphia Authority for Industrial Development Senior Housing Revenue Bonds (The Pavilion) (“Wilmington Trust”), by and through its undersigned counsel, respectfully requests the entry of default against Defendant Pavilion Apartments Penn LLC (“Pavilion”), for its failure to plead or otherwise respond to Wilmington Trust’s Complaint (“Complaint”) (Dkt. No. 1) on the grounds that:

1. Pavilion was served with the Summons and Complaint on October 10, 2022. A copy of the Affidavit of Service appears on the docket at ECF No. 11. (Ex. A).

2. Pursuant to Federal Rules of Civil Procedure 12(a)(1)(A)(i) and 12(b), Pavilion had twenty-one days from service on October 10, 2022—*i.e.*, until October 31, 2022—to answer or otherwise respond to the Complaint.

3. To date, as reflected on the docket, Pavilion has not answered or otherwise responded to the Complaint, nor sought an extension to do so.

The bases for this request are further set forth in the accompanying Declaration, which is incorporated herein by reference. (Ex. B).

Respectfully submitted,

Dated: November 03, 2022

/s/ James Mangiaracina

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*Counsel for Plaintiff Wilmington Trust, National  
Association*

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a copy of Plaintiff's foregoing request for entry of default to be served via first-class mail, postage prepaid, upon:

c/o Vcorp Services, LLC/CT Corporation System  
600 N. 2nd Street, Suite 401  
Harrisburg, PA 17101

Dated: November 03, 2022

/s/ James Mangiaracina  
James Mangiaracina, PA ID No. 329077

*Counsel for Plaintiff Wilmington Trust,  
National Association*